

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR VIOLATIONS OF  
THE FEDERAL CONTROLLED SUBSTANCES ACT

UNITED STATES OF AMERICA

\* CRIMINAL DOCKET NO:

v.

\* SECTION: “ ”

THOMAS G. WILLIAMS

\* VIOLATION: 21 U.S.C. § 841(a)(1)

a/k/a “Cuz”, a/k/a “Tom”

21 U.S.C. § 841(b)(1)(A)

MARLON WILLIAMS

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21 U.S.C. § 841(b)(1)(B)

a/k/a “Tangy”, a/k/a “Tingy”

21 U.S.C. § 841(b)(1)(C)

LATOYA JORDAN

\*

21 U.S.C. § 841(b)(1)(D)

a/k/a “T”

21 U.S.C. § 846

TREMELL ARMSTEAD

\*

18 U.S.C. § 2

a/k/a “Mel”

COREY TOLIVER

\*

a/k/a “Woog”

JOHN DOMINO, JR.

\*

a/k/a “JD”

ZERRON NEALY

\*

a/k/a “Boss”, a/k/a “Zee”

HERBERT KEYS III

\*

a/k/a “Keys”

BRANDON E. TURNER

\*

a/k/a “Bubba”

JEFFERY G. TERRANCE

\*

a/k/a “Jeff”

\* \* \*

The Grand Jury charges that:

**COUNT 1**

Beginning at a time unknown but on or before March 7, 2008, and continuing until on or about July 1, 2010, in the Eastern District of Louisiana, and elsewhere, the defendants, **THOMAS G. WILLIAMS**, a/k/a “Cuz”, a/k/a “Tom”, **MARLON WILLIAMS**, a/k/a “Tangy”, a/k/a “Tingy”, **LATOYA JORDAN**, a/k/a “T”, **TREMELL ARMSTEAD**, a/k/a “Mel”, **COREY TOLIVER**, a/k/a “Woog”, **JOHN DOMINO, JR.**, a/k/a “JD”, **ZERRON NEALY** a/k/a “Boss, a/k/a “Zee”, **HERBERT KEYS, III**, a/k/a “Keys”, **BRANDON E. TURNER**, a/k/a “Bubba”, and **JEFFERY G. TERRANCE**, a/k/a “Jeff” did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to the Grand Jury, to distribute and to possess with the intent to distribute one (1) kilogram or more of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A); all in violation of Title 21, United States Code, Section 846.

**COUNT 2**

On or about March 7, 2008, in the Eastern District of Louisiana, the defendant, **THOMAS G. WILLIAMS**, a/k/a “Cuz”, a/k/a/ “Tom”, did knowingly and intentionally possess with intent to distribute one hundred (100) grams or more of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

### **COUNT 3**

On or about July 7, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **COUNT 4**

On or about July 8, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **COUNT 5**

On or about September 23, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

### **COUNT 6**

On or about September 24, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally possess with intent to distribute a

quantity of heroin, a Schedule I drug controlled substance, and a quantity of oxycodone, a Schedule III drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and 841(b)(1)(D).

#### **COUNT 7**

On or about October 1, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT 8**

On or about October 14, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

#### **COUNT 9**

On or about October 15, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C) and Title 18, United States Code Section 2.

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#### **COUNT 10**

On or about November 19, 2009, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR.**, a/k/a “JD”, did knowingly and intentionally distribute a quantity of heroin, a

Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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**COUNT 11**

On or about April 19, 2010, in the Eastern District of Louisiana, the defendant, **JOHN DOMINO, JR**, a/k/a “JD”, did knowingly and intentionally possess with intent to distribute a quantity of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).\_\_\_\_\_

**COUNT 12**

On or about May 16, 2010, in the Eastern District of Louisiana, the defendants, **THOMAS G. WILLIAMS**, a/k/a “Cuz”, a/k/a “Tom”, **LATOYA JORDAN**, a/k/a “T”, **MARLON WILLIAMS**, a/k/a “Tangy”, a/k/a “Tingy”, **TREMELL ARMSTEAD**, a/k/a “Mel”, and **JEFFERY G. TERRANCE**, a/k/a “Jeff” did knowingly and intentionally possess with intent to distribute, one (1) kilogram or more or more of heroin, a Schedule I drug controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A) and Title 18, United States Code, Section 2.

**NOTICE OF FORFEITURE**

1. The allegations of Counts 1-12 of this indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 21, United States Code, Section 853.

2. As a result of the offenses alleged in Counts 1-12, the defendants, **THOMAS**

**WILLIAMS**, a/k/a “Cuz”, a/k/a “Tom”, **MARLON WILLIAMS** , a/k/a “Tangy”, a/k/a “Tingy”, **LATOYA JORDAN**, a/k/a “T”, **TREMELL ARMSTEAD**, a/k/a “Mel”, **COREY TOLIVER**, a/k/a “Woog”, **JOHN DOMINO, JR.**, a/k/a “JD”, **ZERRON NEALY** a/k/a “Boss, a/k/a “Zee”, **HERBERT KEYS, III**, a/k/a “Keys”, **BRANDON E. TURNER**, a/k/a “Bubba”, and **JEFFERY G. TERRANCE**, a/k/a “Jeff”, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts of this indictment.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 21, United States Code, Section 853.

A TRUE BILL:

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F O R E P E R S O N

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JIM LETTEN #8517  
UNITED STATES ATTORNEY

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JAN MASELLI MANN #9020  
First Assistant United States Attorney  
Chief, Criminal Division

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KEVIN G. BOITMANN #26203  
Assistant United States Attorney

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W. SCOTT LARAGY #25755  
Assistant United States Attorney

New Orleans, Louisiana  
July 8, 2010